

DISCLOSURE DIVISION

☒ **WAIVER REQUEST**
☐ **ANSWER**
☐ **RECONSIDERATION REQUEST**
☐ **UNTIMELY**

DATE: 6/11/2021

DOCKET #:

Ashley Wimberley, Director
Disclosure Division

FILER INFORMATION

Name: T. Rowe Price Associates / Bradley Meeker
Address: 100 E. Pratt Street, Baltimore, MD 21202
Office/Position: Bradley Meeker
of Disclosures/Amendments Filed with Agency: 10
Years Covered: 2020
Final Report: No

REPORT INFORMATION

Name of Report: Retirement Systems Financial Disclosure for 2020
Report ID: RSD21000033
Original Due Date: 8/17/2020
NOD Received: N/A
PFD/Answer Due Date based on NOD: N/A
PFD/Answer Filed: 2/12/2021

LATE FEE INFORMATION

Amount of Late Fee: \$2500
Days late from receipt of NOD: N/A
Total days late from initial due date: 179
Late Fee Order Received: 5/19/2021
Payment/Waiver Request Due Date: 6/8/2021
Waiver Request Received: 5/15/2021 and 6/7/2021

COMMENTS:

Bradley Meeker is requesting a Waiver Request for the late filing of the 2020 Retirement System Disclosure for T. Rowe Associates. Mr. Meeker stated his failure to file the disclosure for the Louisiana State for the Police Retirement System was simply overlooked in their regular reporting cycle as the company was dealing with the impact of the COVID-19 Pandemic. When reviewing records for the most recent six-month period ending December 31, 2020, he realized that the previous six-month period disclosure for an event in February 2020 at the LATEC Symposium was not submitted. Mr. Meeker stated the failure to file was not intentional, nor was it an effort to avoid disclosing spending that occurred during February of 2020 event. This is the first late filing and late fee assessment for T. Rowe Associates and Bradley Meeker.

OTHER LATE FEE INFORMATION

Disclosure Statements:

- Other Outstanding Statements: No
- Other Outstanding Late Fees: No
- Prior Late Fees: No
- Reassessed Late Fees: No

Campaign Finance:

- Outstanding Late Fees: No
- Prior Late Fees: No



June 4, 2021

Ms. Ashley Wimberly
Director, Disclosure Division
Louisiana Board of Ethics
PO Box 4368
Baton Rouge, Louisiana 70821

Dear Ms. Wimberly:

We wanted to again apologize for the delay in sending last year's bi-annual Financial Disclosure Statement as it relates to our client, the Louisiana State Police Retirement System. We also ask that you please accept this letter as our official request to waive the fees assessed.

We appreciate the Louisiana Board of Ethics' efforts in strengthening financial disclosures and avoiding conflict of interest in investment manager relationships with state entities. We would offer that we've demonstrated a long record of timely and accurate reporting to the state regarding our financial interactions with state entities. As mentioned in our first letter, we acknowledge that we did miss the deadline for the semi-annual reporting in July of 2020, but to our knowledge this is the first instance of a missed deadline and was simply overlooked in our regular reporting cycle as we dealt with the impact of the COVID-19 pandemic. It was not an intentional oversight nor an effort on our part to avoid disclosing the spending that occurred during February of 2020.

Given our long-standing relationships with a number of state retirement systems and our past adherence to the ethics rules in place in Louisiana, we respectfully ask the Board of Ethics to consider waiving the fee in this instance.

We're happy to discuss further and should you have any questions, please let me know. Thank you for your attention to this matter.

Sincerely,

Bradley D. Meeker
Institutional Client Service

ETHICS BOARD REC'D
JUN 7 '21 PM 12:37



March 9, 2021

Ms. Ashley Wimberly
Louisiana Board of Ethics
PO Box 4368
Baton Rouge, Louisiana 70821

Dear Ms. Wimberly:

We have been in communication with Ms. Wendy Ingram of the Louisiana State Police Retirement System (LSPRS) earlier this month related to our delay in sending the bi-annual Financial Disclosure Statement as it relates to the LSPRS. We submit this letter to apologize for our delay and respectfully request a waiver of the fees assessed.

In looking over the records for the most recent six-month period ending December 31, 2020, we realized that we never submitted a Financial Disclosure Statement for the six-month period immediately preceding it, related to an event at the February LATEC symposium. This was an unintentional oversight on our part. We have enhanced our reporting processes to ensure that we timely file relevant information to LSPRS going forward. We would ask if the Ethics Board would be kind enough to waive any late fees assessed for our filing error.

We're happy to discuss further and should you have any questions, please let me know. Thank you for your attention to this matter.

Regards,

Bradley D. Meeker
Institutional Client Service

ETHICS BOARD REC'D
MAR 15 '21 PM 1:46



March 9, 2021

Ms. Ashley Wimberly
Louisiana Board of Ethics
PO Box 4368
Baton Rouge, Louisiana 70821

Dear Ms. Wimberly:

We have been in communication with Ms. Wendy Ingram of the Louisiana State Police Retirement System (LSPRS) earlier this month related to our delay in sending the bi-annual Financial Disclosure Statement as it relates to the LSPRS. We submit this letter to apologize for our delay and respectfully request a waiver of the fees assessed.

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We're happy to discuss further and should you have any questions, please let me know. Thank you for your attention to this matter.

Regards,

Bradley D. Meeker
Institutional Client Service

ETHICS BOARD REC'D
MAR 15 '21 PM 1:46

Ashley Wimberley

From: Meeker, Brad <Brad.Meeker@troweprice.com>
Sent: Friday, June 4, 2021 3:31 PM
To: Ashley Wimberley
Subject: RE: [EXTERNAL] RE: For contact information
Attachments: Louisiana Board of Ethics Second Response 060421.pdf

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ashley,

Please find attached our request to the Louisiana Board of Ethics for a fee waiver.

Please let me know if you have any questions and if you'd like a copy of this by fax or U.S. mail.

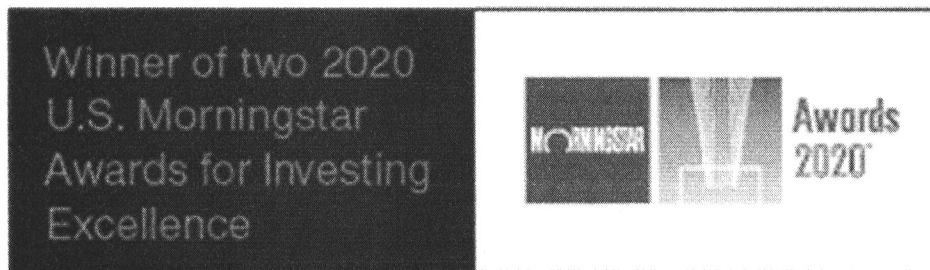
Thank you and enjoy the weekend.

Brad

Bradley D. Meeker
Vice President | Institutional Client Service

T. Rowe Price Associates
100 East Pratt Street
Baltimore, MD 21202
☎Office: (410) 345-2564
☎Mobile: (443) 610-0338
✉E-mail: brad.meeker@troweprice.com

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From: Ashley Wimberley <Ashley.Wimberley@la.gov>
Sent: Wednesday, May 19, 2021 11:21 AM
To: Meeker, Brad <Brad.Meeker@troweprice.com>
Subject: RE: [EXTERNAL] RE: For contact information

Perfect. Thank you Mr. Meeker.

Ashley Wimberley
(225) 219-5629

Ashley Wimberley

From: Meeker, Brad <Brad.Meeker@troweprice.com>
Sent: Tuesday, March 9, 2021 3:25 PM
To: Ashley Wimberley
Cc: Wendy Ingram
Subject: Louisiana State Police Retirement System (LSPRS) Financial Disclosure Form
Attachments: Louisiana Board of Ethics Letter 030921.pdf

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wimberley,

Per our discussions with Wendy Ingram at LSPRS regarding the semi-annual financial disclosure form for the first half of 2020, please find attached our response letter.

We appreciate your assistance with this matter and please let me know if you have any questions.

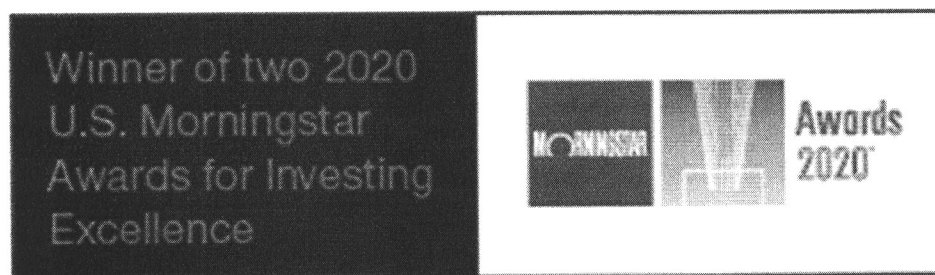
Thank you.

Brad

Bradley D. Meeker
Vice President | Institutional Client Service

T. Rowe Price Associates
100 East Pratt Street
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☎Office: (410) 345-2564
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